



Fictional Request For Production

And

Fictional Production Packet

ADAM ATTORNEY

Larry Litigant
BY EMAIL ONLY

RE: Request For Production,
Litigant v. Suer, Jackson County Circuit Court Case: XXXXXXXXX

Mr. Litigant,

I am the lawyer representing your wife in the pending family law case.

Please consider this a request for production and send me the requested items within 33 days from the date of this email, at the address listed below.

Electronic delivery is preferred but not required.

Per ORCP 36, please also send me the following items:

1. Your most recent pay stub, and if it does not have year to date totals, please also provide your previous three pay stubs.
2. Your tax returns, federal and state, for the last two years.
3. A current statement reflecting the value of your pension account.
4. Your credit report from any major credit reporting agency.
5. All written messages between you and Ginny Girlfriend during the last six months.

Respectfully,

Adam Attorney Date

123 Fake Street, Anytown, USA
Adam@FakeAttorney.com

LARRY LITIGANT

PO Box 2468, Faketown USA
541XXXXXX Larry@fakemail.com

Adam Attorney
BY EMAIL ONLY

RE: XXXXXXXXX

Adam Attorney,

Per your request, enclosed please find my production package.

Respectfully,

Larry Litigant Date

Request 1

Most Recent Paystub with Year To Date Totals Attached

[Redacted]

[Redacted]

[Redacted]

[Redacted]

RESPONSIVE DOCUMENT

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Request 2

Federal and State Tax Returns from last year attached.

Returns from the year prior not attached but will be provided within the time allowed.

[Redacted]

[Redacted]

RESPONSIVE DOCUMENT

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Request 3
Pension Account Statement

This document is not in my possession. Reasonable steps have been taken to obtain the document and more information will be provided as it becomes available.

Request 4

My Credit Report

No documents exist and I object to any attempt to compel me to obtain it as placing an undue burden on me since that information is not necessary.

However, as an attempt to compromise I will agree to sign a release to allow Adam Attorney to obtain my credit report from a specified agency, provided he also obtains the report of my soon to be ex-wife and shares both reports with me.

Request 5
Text Messages

I object.

Ginny Girlfriend and I got married last year so the text messages are protected by the Oregon spousal privilege and not discoverable.